UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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)	C.A. NO.: TBA
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COMPLAINT AND DEMAND FOR JURY TRIAL

PARTIES

- 1. The Plaintiff, Jeanette Vespucci ("Vespucci"), is an individual residing in Brunswick, State of Georgia.
- 2. The Defendant, Schleicher & Stebbins Hotels, LLC, ("Schleicher"), is a foreign limited liability company, duly organized under the laws of the State of New Hampshire, doing business in Massachusetts, with a principal place of business located at 1359 Hooksett Road in Hooksett, New Hampshire, with a registered agent of Henry B. Stebbins, Esq., located at 66 Hanover Street, S301, Manchester, Hillsborough County, State of New Hampshire.

JURISDICTION

3. This court has jurisdiction over this matter pursuant to 28 U.S.C. §1332.

COUNT I

- 4. The Plaintiff realleges, repleads, and incorporates by reference paragraphs 1-3 above as if fully set forth herein.
- 5. On or about July 7, 2011, the Defendant, Schleicher, owned the premises known as the Renaissance Boston Patriot Place Hotel & Spa located at 28 Patriot Place in Foxborough, Norfolk County, Massachusetts.
- 6. On or about July 7, 2011, the Defendant, Schleicher, managed the premises known as the Renaissance Boston Patriot Place Hotel & Spa located at 28 Patriot Place in Foxborough, Norfolk County, Massachusetts.

- 7. On or about July 7, 2011, the Defendant, Schleicher, controlled the premises known as the Renaissance Boston Patriot Place Hotel & Spa located at 28 Patriot Place in Foxborough, Norfolk County, Massachusetts.
- 8. As owner of the property, the Defendant, Schleicher, owes a duty of reasonable care to all persons lawfully on their premises, and to maintain the premises, in a safe condition.
- 9. As owner of the property, the Defendant, Schleicher, owes a duty of reasonable care to all persons lawfully on their premises, and to warn of dangerous conditions thereon.
- 10. On or about July 7, 2011, while lawfully on the premises known as the Renaissance Boston Patriot Place Hotel & Spa located at 28 Patriot Place in Foxborough, owned, managed or controlled by the Defendant, Schleicher, the Plaintiff was caused to slip and fall and injure herself due to an unsafe and dangerous condition which existed on the premises of which the Defendant knew, or should have known existed, specifically an excessively slippery shower floor.
- 11. As a result of the Plaintiff's slip and fall caused by the Defendant's negligence, the Plaintiff sustained serious personal injuries, incurred substantial medical bills, and expenses, was prevented from performing her usual duties and was prevented from performing her usual living activities.
- 12. As a result of the fall, the Plaintiff, Vespucci, suffered serious and permanent injuries.

WHEREFORE, the Plaintiff, Jeanette Vespucci, prays that this Honorable Court enter judgment against the Defendant, Schleicher & Stebbins Hotels, LLC, on Count I, in the full amount of any and all damages recoverable at law, cost, attorney's fees, and for such other and further relief which this Court deems just and proper, as a result of the Defendant's negligence.

THE PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE

Respectfully submitted, Plaintiff, JEANETTE VESPUCCI, By her Attorney,

/s/ David M. Lentini, II

David M. Lentini, II, Esq., BBO#: 666501 JASON STONE INJURY LAWYERS One State Street, Suite 1500 Boston, MA 02109 (617) 523-4357 DML@StoneInjury.com

Dated: October 16, 2012